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January 7, 2021

Via ECF

Hon. Lorretta A. Preska
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **Giuffre v. Dershowitz, No. 19-cv-3377-LAP**

Dear Judge Preska:

We represent non-party Sharon Churcher in connection with the Subpoena served on her by Defendant Alan Dershowitz. In our letter of December 8, 2020 (ECF No. 221), we requested that the Court hold our request for a pre-motion conference for a motion to quash in abeyance while we conferred with the parties to determine whether the issues in the potential motion could be narrowed or resolved. The Court granted that request. *See* ECF No. 222. Since then, we have continued to confer in good faith with the parties, and have made further progress in narrowing the issues, but have not yet completed our determination whether all potential objections to the subpoena can be resolved without motion practice. Accordingly, we respectfully request that the Court continue to hold our request for a pre-motion conference in abeyance for an additional fourteen (14) days (through January 21, 2021), to allow the parties to continue to confer. On or before January 21, 2021, we will report back to the Court to either notify the Court that no motion will be necessary or to request a conference and/or briefing schedule for the anticipated motion to quash.

We have conferred with counsel for Plaintiff and Defendant and both consent to this requested relief.

Respectfully Submitted,

Davis Wright Tremaine LLP

/s/ Laura R. Handman

cc: All parties (via CM/ECF)

Ms. Churcher's request for a pre-motion conference will be held in abeyance through January 21, 2021. SO ORDERED.

Lorretta A. Preska 1/8/2021

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